

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

ALL ACTIONS

**DECLARATION OF JENNIFER
HANDLEY IN SUPPORT OF
DEFENDANTS' MAY 13, 2025
PRIVILEGE DISPUTE BRIEF
PURSUANT TO SPECIAL MASTER
ORDER NO. 4, § III, ¶ 2**

DECLARATION OF JENNIFER HANDLEY

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees

1 related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in
2 the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and
3 Rasier-CA, LLC's May 13, 2025 brief pursuant to Special Master Order No. 4, § III, ¶2 (ECF 2933).
4 The facts set forth herein are true and correct and are based on my own personal knowledge, and I
5 could and would competently testify thereto if called.
6

7 2. I have reviewed the documents identified in the privilege log as
8 JCCP_MDL_PRIVLOG083040, JCCP_MDL_PRIVLOG083042, and
9 JCCP_MDL_PRIVLOG083044. These documents are automatically generated emails notifying the
10 recipients that comments or edits had been made in a confidential and privileged Google document
11 titled "US&C Mass Tort Playbook - T&S (A/C Priv & Confidential)." The Mass Tort Playbook was
12 created with legal guidance and direction in response to, and anticipation of, litigation provided by a
13 team of Uber's in-house attorneys, including then-Senior Counsel, Safety and Insurance Litigation,
14 High Exposure, US & Canada Mariana Gerontides, then-Director Safety and Insurance Litigation,
15 Special Matters, US & Canada Lauren Shapiro, then-Senior Counsel, Safety and Insurance Litigation,
16 High Exposure, US & Canada Cameron Gordon, and me. I understood at the time that I, along with
17 other lawyers, were being asked to provide legal advice in light of the legal risk concerning external
18 communications and internal processes after a case involving allegations of sexual misconduct is filed
19 against Uber. The Mass Tort Playbook reflects legal advice provided by myself and other in-house
20 counsel at Uber and was maintained confidentially with only limited employees who needed to review
21 the Playbook to perform their jobs receiving access.
22
23

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct.
26
27

Executed on May 13, 2025.

By: Jennifer Handley

Jennifer Handley